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 Attorney for Defendant:
JUAN VALDERRAMA-ORTIZ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. M. JAMES LORENZ)

UNITED STATES OF AMERICA)	CASE NO. 07CR3477-L
)	
Plaintiff,)	Date: July 14, 2008
)	Time: 2:00 p.m.
v.)	
)	
JUAN VALDERRAMA-ORTIZ,)	NOTICE OF MOTION AND MOTIONS
)	TO:
)	(1) COMPEL DISCOVERY
Defendant)	(2) SUPPRESS POST ARREST
)	STATEMENT
)	(3) PRECLUDE USE OF DEPORTATION
)	ORDER AS PROOF OF ALIENAGE
)	(4) REQUIRE GOVERNMENT TO
)	PROVE ALIENAGE BEYOND A
)	REASONABLE DOUBT
)	(5) GRANT LEAVE TO FILE FURTHER
)	MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
 AARON B. CLARK, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on Wednesday, July 14, 2008 at 2:00 p.m., or as soon
 thereafter as counsel may be heard, the defendant, JUAN VALDERRAMA-ORTIZ, by and
 through counsel, Stephen W. Peterson will ask this Court to issue an order granting the motions
 listed below.

MOTIONS

The defendant, JUAN VALDERRAMA-ORTIZ, by and through counsel, Stephen W. Peterson, asks this Court pursuant to the Fifth and Sixth Amendments to the United States Constitution, Federal Rules of Criminal Procedure 7(d), 12, 16 and 26.2, and all other applicable statutes and local rules for an order to:

1. compel discovery;
2. suppress post arrest statement;
3. preclude use of deportation order as proof of alienage;
4. require government to prove alienage beyond a reasonable doubt;
5. grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing on these motions.

Respectfully submitted,

Dated: June 30, 2008

/s/ Stephen W. Peterson

STEPHEN W. PETERSON
Attorney for Defendant
JUAN VALDERRAMA-ORTIZ